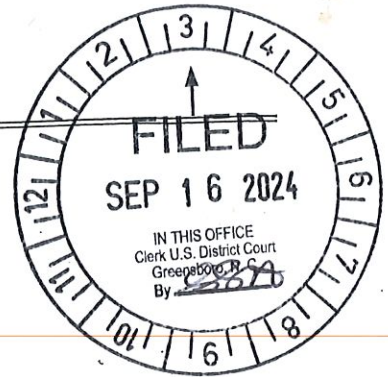


UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

Division



Case No.

24cv761

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes

☐ No

Robert Charles Anthony King

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

John Parsley -v- Daket Melanie Davis
 Terry Johnson Christy Wilson
 Secun Boone Dean Culber
 Elizabeth Oliver Joey England
 Takeesa Washington Isaac Groves
 Guff Lucas / Justin Melrose Hodeh Carrie

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Robert Charles Anthony King
 9717 Poplar Street
 New Port Richey Pasco
 Florida 34654
 727-810-3266
 crookedalamarce2019@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Guy Lucas / Justyn Melrose
High Point Fox 8 News
2005 Francis Street
High Point Guilford
North Carolina 27263
336-621-1185
news@wgtp.com

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Isaac Groves
Time News and USA Today Network
707 South Main Street
Burlington NC Alamance
North Carolina 27215
919-996-8039

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Hodgin Carrie
WXII 12
200 Coliseum Drive
Winston Salem Forsyth
North Carolina 27106
Carrie.hodgin@hecast.com

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Dale + Melanie Davis
Mebane Enterprise
106 North 4th Street
Mebane N.C. 27302

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Sheriff Terry Johnson
Sheriff of Alamance County
109 South Maple Street
Graham Alamance
North Carolina 27253
336-570-10300

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Sean Boone
District Attorney Prosecutorial District 17
212 West Elm Street
Graham Alamance
North Carolina 27253
336-570-5210

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Elizabeth Oliver
Assistant District Attorney District 17
212 West Elm Street
Graham Alamance
North Carolina 27253
336-570-5210

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Jaleesa Washington
Detective Alamance County Sheriff's Office
109 South Maple Street
Graham Alamance
North Carolina 27253
336-570-10300

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Christian Wilson
Alamance County Sheriff's office
109 South Maple Street
Graham Alamance
North Carolina 27253
336-570-6300

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Dean Culler
Alamance County Sheriff's office
109 South Maple Street
Graham Alamance
North Carolina 27253
336-570-6300

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Joey England
Alamance Sheriff's Office
109 South Maple Street
Graham Alamance
North Carolina 27253
336-570-6300

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

John P Paisley
Commissioners of Alamance County
124 West Elm St
Graham Alamance
NC 27253
336-225-1312

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

(42 US Code § 1983) Defamation, Slander, Libel, Kidnapping
4th, 5th, 6th, 8th and 14th Amendment Parental Rights
False Imprisonment, False arrest, Malicious Prosecution

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Robert Charles Anthony King, is a citizen of the
State of (name) Florida Pasco County

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____

United States District Courts
For Middle District
of North Carolina

Continue of Page 5 and 6 # 2. and
Statement of Claim.

1) Terry Johnson in his Official is a citizen of
Alamance County North Carolina is the Sheriff
of Alamance County Color of Law

Terry Johnson is responsible for his Employee that is
Employment at the Alamance County Sheriff's Office and
to ensure that each employee conduct in faithful
matter and accord to Law.

2) Sean Boone in his Official ^{and Individual} is a citizen of
Alamance County North Carolina. He is the District
Attorney Prosecutorial District 12 Color of Law

3) Elizabeth Oliver in her Individual is a citizen of
North Carolina Color of Law. She is the District
Attorney Assistance Prosecutorial District 12

4) Detective Jaleesa Washington in her Individual
is a citizen of North Carolina color of Law
She is employed by the Alamance County
Sheriff's office

- 5) Christian Wilson in her Individual is citizen of North Carolina color of law She is employed by the Alamance Sheriff's Office
- 6) Dean Culler in his Individual is citizen of North Carolina color of law is employed by the Alamance Sheriff's Office
- 7) Joey England in his Individual is citizen of North Carolina color of law is employed by the Alamance Sheriff's Office
- 8) Guy Lucas and Justyn Melrose in their Individual are citizen of North Carolina and is employed at HighPoint Fox 8 news
- 9) Hodgins Carrie in her Individual is citizen of North Carolina and is employed at WXII 12 News at Winston Salem
- 10) Isaac Groves in his Individual is citizen of North Carolina is Employed at Burlington Time News
- 11) Duke and Melanite Davis in their Individual is citizen of North Carolina

Sean Boone and Elizabeth Oliver

Both of these Defendants violated Plaintiff's
~~4th~~ ~~5th~~ ~~6th~~ ~~8th~~ and 14th Amendments, Defamation, Slander
Liberal, Kidnapping, Parental Constitution violation, False
Imprisonment, False arrest. Malicious Prosecution
42 US Code 1983

Sheriff Terry Johnson Sheriff of Alamance
County, John P. Paisley Commissioners of Alamance
County, Christian Wilson, Dean Culver, Joey England
and Taleesa Washington all worked at the
Alamance County Sheriff Office they all
violated Plaintiff's Constitution right as a parent
Detaining Plaintiff against his will and falsely
Imprisonment Plaintiff over three "3" years of
confinement made defamation, slander and Liberal
against the Plaintiff, Kidnapping ~~4th~~, ~~5th~~, ~~6th~~, ~~8th~~
and 14th Amendment, False arrest, Malicious Prosecution

Plaintiff was arrested by the Alamance County
Sheriff's office August 12 2019 was falsely detained
for over 3 years was found not guilty by 12
panel jury on September 16th 2022 was
released.

Alamance Sheriff Office and Alamance District
Attorney County did not investigate or interview everyone
to ensure that Plaintiff is not wrongfully
accused.

Plaintiff had all proofs of his

Guy Lucas/Justyn Mulrose, Dale + Melanile Davis,
Issac Groves Hodgins Corrie they all work at or
as a reporter for the News and made a
Defamation Slander libel about the
Plaintiff.

Robert Charles Sullivan King
September 15th 2024

his innocent. They failed to conduct safe investigation nor had any proof of evidence of time frame. Plaintiff was in fact in full legal custody and was awarded sole custody by Guilford County High Court. Alamance never had jurisdiction over subject matter nor was ~~resident~~ resident of Alamance county at all. Plaintiff was not able to get Bail Hearing for three "3" years.

Robert Charles Anthony Klug
September 15th 2024

Robert Charles Anthony Klug
9717 Poplar Street
New Port Richey Florida
email crookedalamance2019@gmail.com

12) John P Paisley in his Official is citizen of North Carolina he is the Chair Commissioners of Alamance County. He is Responsible for Alamance County Sheriff Office and District Attorney Office

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attach

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

award Plaintiff \$13,500,000 \$3.5 million

Expungement of all Records of Alamance County.

Remove/Delect all Defamation, Slander

All News Defamation \$50,000 each

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: September 15th 2024

Signature of Plaintiff

Printed Name of Plaintiff

Robert Charles Anthony King
Robert Charles Anthony King

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address